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CICHANOWICZ, CALLAN, KEANE,
VENGROW & TEXTOR, LLP
Attorneys for Defendant Ocean World Lines, Inc.
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNDERWRITERS At LLOYDS a/s/o
YOUNGLIN B & A Co., Ltd.,

Plaintiff,

-against-

OCEAN WORLD LINES, INC.

Defendant.

OCEAN WORLD LINES, INC.

Third-Party Plaintiff,

-against-

ANL CONTAINER LINE PTY LIMITED t/a
ANL; ANL SINGAPORE PTE LTD.

Third-Party Defendants.

Civil Case Number 07 Civ. 6628
Judge Crotty

**OCEAN WORLD LINES, INC.'S
THIRD PARTY COMPLAINT**

Pursuant to Rule 14 (c) of the Federal Rules of Civil Procedure, Defendant and Third-Party Plaintiff Ocean World Lines, Inc. by its attorneys Cichanowicz, Callan, Keane, Vengrow & Textor, LLP as and for a Third-Party Complaint against the Third-Party Defendants ANL Singapore PTE Ltd. and ANL Container Line PTY Limited trading as ANL, is tendering the Third-Party Defendants directly to Plaintiff and alleges upon information and belief as follows:

1. The underlying claim is an admiralty and maritime claim within the meaning of Rule 9 (h) of the Federal Rules of Civil Procedure.

2. Defendant and Third-Party Plaintiff Ocean World Lines, Inc. is a corporation located at 1981 Marcus Avenue, Lake Success, New York 11041.

3. Upon information and belief, ANL Container Line PTY Limited trading as ANL is a corporation or other business entity organized and existing under and by virtue of the laws of a foreign country, and trades or otherwise does business in the U.S., including New York, through its general agents, Northern Lilly International, Located at 40 Craigwood Road, South Plainfield, New Jersey 07080.

4. Upon information and belief, Defendant ANL Singapore PTE Ltd., is a corporation or other business entity organized and existing under and by virtue of the laws of a foreign country, and trades or otherwise does business in the U.S. including New York through its general agents, Northern Lilly International, located at 40 Craigwood Road, South Plainfield, New Jersey 07090.

5. Plaintiff's underwriters at Lloyds a/s/o Younglin B&A Co. Ltd. has filed suit against Ocean World Lines, Inc. alleging \$11,689.50 in damages for (1) breach of contract (2) negligence (3) gross negligence and (4) breach of bailment involving an ocean shipment of cargo consisting of 20 bags of chemicals pursuant to Bill of Lading NO65003560 (container number BCMU4017689) for alleged wetting damage. A copy of the Summons with Notice (which was removed from state court) and Ocean World Lines, Inc.'s Answer is attached as Exhibit 1.

6. As the ocean carrier, Third-Party Defendants ANL Container Line PTY Limited t/a ANA and ANL Singapore PTE Ltd. are directly liable to plaintiff for the alleged damage, if any, which is denied by Ocean World Lines, Inc.

7. In the alternative, if Defendant and Third-Party Plaintiff Ocean World Lines, Inc. suffered liability as alleged in the Summons with Notice, which is denied, such liability was caused solely by the negligence, gross negligence, breach of contract and/or breach of warranty, expressed or implied by one or both of the Third-Party Defendants individually and/or jointly.

8. As a result of the foregoing, Third-Party Defendants ANL Container Line PTY Limited t/a, ANL and ANL Singapore PTE Ltd. should be required to contribute and/or indemnify Ocean World Lines, Inc. for any amount it may be required to pay including costs, disbursements and reasonable attorneys fees incurred by Ocean World Lines, Inc. in this action.

WHEREFORE, Defendant and Third-Party Plaintiff Ocean World Lines, Inc. demands:

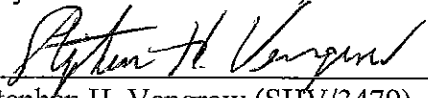
1. Judgment against Third-Party defendants ANL Container Line PTY Limited t/a ANL and ANL Singapore PTE Ltd. directly to Plaintiff for all damages.

2. In the alternative for all sums that may be adjudged against Defendant and Third-Party Plaintiff Ocean World Lines, Inc. in favor of Plaintiffs, together with the cost and disbursements of this action including reasonable attorney's fees.

Dated: August 2, 2007

Respectfully submitted,

CICHANOWICZ, CALLAN, KEANE,
VENGROW & TEXTOR, LLP
Attorneys Ocean World Lines, Inc.

By: 
Stephen H. Vengrow (SHV/3479)
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(212) 344-7042

To: Cozen O'Connor
James F. Campise, Esq.
Attorney for Plaintiff
45 Broadway, 16th Floor
New York, New York 10006
(212) 509-9400

CERTIFICATE OF SERVICE BY ECF AND BY REGULAR U.S. MAIL

The undersigned declares under penalty of perjury that the following is true and correct:

1. I am over the age of eighteen years and I am not a party to this action.
2. On August 2, 2007, I served a complete copy of Defendant Ocean World Lines, Inc.'s

Third Party Complaint by ECF to the following attorney at his ECF registered address and by regular U.S. mail at the following address:

Cozen O'Connor
James F. Campise, Esq.
Attorney for Plaintiff
45 Broadway, 16th Floor
New York, New York 10006
(212) 509-9400

/ s / Patrick Michael DeCharles, II
Patrick Michael DeCharles, II (PMD/9984)

DATED: August 2, 2007
New York, New York